

**UNITED STATES BANKRUPTCY COURT
EATERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
	:	
WANDA HENRY a/k/a	:	
WANDA LEWIS	:	
Debtor	:	BANKRUPTCY NO. 18-18415
	:	
Us Bank National Association	:	
Movant	:	

**DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM THE AUTOMATIC
STAY FILED BY US BANK NATIONAL ASSOCIATION**

NOW COMES WANDA HENRY a/ka/ WANDA LEWIS, by and through her attorney,
Ashley M. Sullivan, Esquire, and hereby files an answer to the Motion for Relief from the
Automatic Stay.

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. Movant did not provide any payment history in connection with the
alleged delinquency.
7. Denied. Attorney for movant did not provide any evidence of fees and costs
incurred for the filing of said motion.
8. Denied. Debtor has sufficient funds to cure any current delinquency.
9. Denied. Debtor denies the averments set forth in paragraph 9 and strict proof is
demanded.
10. Admitted.

WHEREFORE, Respondent respectfully requests that Movant's Motion to Relief from the Automatic Stay be denied.

FREEDMAN AND LORRY, P.C.

BY: /s/ Ashley M. Sullivan

ASHLEY M. SULLIVAN, ESQUIRE
Attorney for Debtor

CERTIFICATION

Petitioner certifies under penalty of perjury that the matters stated herein are true and correct to the best of her knowledge, information, and belief.

DATE: August 6, 2018

ATTORNEYS FOR DEBTORS

/s/ Ashley M. Sullivan
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